## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICTOF ALABAMA, EASTERN DIVISION

CANDACE ALEXANDER

Plaintiff,

Vs.

CIVIL ACTION NO.: 1:25=CV-980-CLM

JAMEKA SCALES, COREY BENNETT, PATRICK BENNETT and VICKIE BENNETT,

Defendants.

MOTION FOR SUMMARY JUDGEMENT AND MOTION TO DISMISS, PRESENTING DEFENSES OF FAILURE FORTAGE CLAIM, LACK OF JURISDICTION UNDER RULE 12(B)

Comes now the Defendant, Jameka Scales, and prays this Honorable Court will dismiss this frivolous cause of action based upon the following:

- 1. To dismiss the action because the complaint fails to state a claim against defendant upon which relief can be granted.
- To dismiss the action on the grounds that the court lacks jurisdiction because the amount actually in controversy is less than ten thousand dollars exclusive of interest and costs.
- 3. Attached hereto and incorporated herein by reference is my Affidavit as Exhibit "A".
- 4. That Plaintiff sued me for actions between her husband and my brother and Defendant, Corey Bennett. She does not have standing to sue me over someone else's actions.
- 5. That there is no cause of action for the rantings in the Petition. I have done nothing.
- 6. That this is a fraudulent case.
- 7. That my brother and Defendant, Corey Bennett, filed a criminal charge against Keith Alexander. The Plaintiff's entire case is due to her husband's criminal charge. I had nothing to do with the criminal charge.
- 8. I fear for my sister's mental health. It looks like an artificial intelligence pleading.

  Respectfully submitted the day of August 2025.

DI-

JAMEKA SCALES

STATE OF ALABAMA	)
	)
	,
COUNTY OF HARVEST	`

## AFFIDAVIT OF JAMEKA SCALES

Before me, a duly authorized Notary Public in and for the State of Alabama, did appear, Jameka Scales, who, being personally known to me, did swear and affirm as follows:

My name is Jameka Scales, I am over the age of nineteen (19) years and one of the Defendants in Civil Action No.: 1:25-CV-980-CLM, and I have personal knowledge of the matters set forth herein. I am a citizen of Harvest County, Alabama.

My sister is Candace Alexander, and she is married to Keith Alexander. Mr. Alexander harassed my brother, Corey Bennett, and he filed a criminal charge against him in Tishomingo County State Court. My brother, Corey Bennett, did not file a criminal charge against the Plaintiff, Candace Alexander.

Candace sued me in this case. I have done nothing to Candace. This is a frivolous case. I am worried about Candace's mental health.

There is no cause of action in this case. Candace is using the Court to harass me and my family. Please read the complaint. Candace's pleadings sound like they were generated by artificial intelligence.

I did not enable group manipulation with my family members against Candace Alexander. I did not "act as a central conduit for emotional, procedural, and narrative coordination" for Corey Bennett, Patrick Bennett, and Vickie Bennett.

I did not create a group chat to in order to "coordinate messages" to or from the Plaintiff, Candace Alexander. In fact, the Plaintiff admits herself on Page 18, Paragraph # 8, titled: *April* 23, 2025-Coordinated Group Chat and Defendant Admissions, that it was "The Plaintiff initiated a group chat with Defendants, Corey, Patrick, Jameka, and Vickie Bennett, and witness Chasity Bennett".

I did "remain silent" in the group chat as the Plaintiff stated, however it was not a "strategic non-response, designed to reinforce isolation and suppress future speech", it was due to the fact that the context of the group messages were literally insane. As the Plaintiff stated several times in her Complaint, she had on "March 8-Jameka cutoff". I did not want to engage in conversations over text, when I was not one hundred percent sure that it was in fact Candace that I was interacting

with, so I did not respond. That is not illegal and my silence was not "operated as complicity". Complicity to what? This complaint does not even make sense and is complete insanity.

I did not function "as a quiet internal informant, supplying the ammunition for guilt-based pressure and emotional destabilization." I did not serve "as the connective tissue between the emotional manipulators and the Plaintiff's private life, concerting silence, proximity, and access into weapons". I did not relay "private and sensitive information about the Plaintiff, Candace Alexaner" in order to start "spiritual and emotional manipulation campaigns that targeted the Plaintiff during moments of medical and emotional vulnerability". I told my mom that my sister had surgery and we needed to add her to our prayers for fast healing.

I did take a vacation to Gatlinburg with my spouse, my brother Corey and his spouse. I did not spend my money or vacation time to take this trip to "covert coordination" or as a "staging ground" for anything that had to do with the Plaintiff, Candace Alexander. I took this trip because I enjoy spending time with my spouse and my brother and his spouse.

I never "formed a coordinated emotional harassment pipeline masked as faith" between the Plaintiff and my other family members. I am not a "triangulation agent and medical informant".

I did not act as an "emotional relay, medical information conduit, and passive enabler of religious manipulations" for any "co-conspirator" towards Candace Alexander.

The Plaintiff does not even have standing to ask for what she is asking for. The Plaintiff needs a mental health evaluation. Further, Affiant sayeth not.

STATE OF ALABAMA COUNTY OF HARVET

Before me, a notary public, in and for said county and said state, personally appeared Jameka Scales who being known to me, and being by me first duly sworn, does depose and say that she has knowledge of the facts and matters stated in the above complaint and that said facts are true and correct according to the best of her knowledge, information, and belief.

Sworn to and subscribed before me

NOTARY PUBLIC

2025.

JANUELLA BENOT Scales 16781 Wellhouse Drive Harvest, Alabama 35749